

1 William B. Curtis, Esq. (TX SBN 00783918)  
2 (*admitted pro hac vice*)  
3 **CURTIS LAW GROUP**  
4 17754 Preston Rd., Suite 200  
5 Dallas, Texas 75252  
6 Telephone: (214) 890-1000  
7 Facsimile: (214) 890-1010  
8 Email: bcurtis@curtis-lawgroup.com

9  
10 **IN THE UNITED STATES DISTRICT COURT**  
11 **FOR THE DISTRICT OF ARIZONA**

12 **IN RE: BARD IVC FILTER PRODUCTS**  
13 **LIABILITY LITIGATION**

14 **MDL No. 2:15-MD-02641-PHX-DGC**

15 This document relates to the cases listed on  
16 Exhibit A attached hereto.

17  
18 **STIPULATION OF DISMISSAL WITH PREJUDICE**

19 COME NOW, Plaintiffs whose cases are listed on Exhibit A attached hereto (“Plaintiffs”) and  
20 Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. (“Defendants”), file this Stipulation of  
21 Dismissal with Prejudice, and in support thereof, respectfully show the Court as follows:

22 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Defendants hereby  
23 stipulate to the dismissal of the cases listed on Exhibit A with prejudice to the re-filing of same. Plaintiffs  
24 and Defendants further stipulate that they are to bear their own costs.

25 WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request  
26 that the Court dismiss the cases listed on Exhibit A in their entirety with prejudice to the re-filing of same  
27 and order that these parties are to bear their own costs.

28 //

//

Respectfully submitted this 7<sup>th</sup> day of April 2021.

Respectfully submitted,

/s/ William B. Curtis  
WILLIAM CURTIS, Esq.  
Texas State Bar No. 00783918  
**CURTIS LAW GROUP**  
17754 Preston Rd., Suite 200  
Dallas, TX 75252  
(214) 890-1000 Telephone  
(214) 890-1010 Facsimile  
[bcurtis@curtis-lawgroup.com](mailto:bcurtis@curtis-lawgroup.com)

**ATTORNEY FOR PLAINTIFF**

/s/ Richard B. North  
Richard B. North, Jr., GA Bar #545599  
Nelson Mullins Riley & Scarborough, LLP  
2017 17<sup>th</sup> St. NW, Suite 1700  
Atlanta, GA 30363  
Tel: 404-322-6000  
Fax: 404-322-6050  
[Richard.north@nelsonmullins.com](mailto:Richard.north@nelsonmullins.com)  
**Attorneys for Defendants**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7<sup>th</sup> day of April 2021, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System which will automatically send email notification of such filing to all attorneys of record.

/s/ William Curtis  
WILLIAM CURTIS